

**REQUIRED STATEMENT TO ACCOMPANY  
ALL MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Paul Zankovich Case No. 16 B 34834 Chapter 13

All Cases: Moving Creditor Dominions Patio Homes Condo Assn No 1 Date Case Filed October 31, 2016

Nature of Relief Sought: XX Lift Stay Annul Stay XX Other (describe) Dismiss

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed April 7, 2017

Chapter 7: No-Asset Report Filed on \_\_\_\_\_  
No-Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral

a. XX Home 353 Dominion Drive, Wood Dale, Illinois

b. Car Year, Make and Model \_\_\_\_\_

c. Other (describe) \_\_\_\_\_

2. Balance Owed as of Petition Date \$0.00 Includes Fees and Costs.  
Total of all other Liens against Collateral \$106,131.00 Per Debtor(s) Schedule D.

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$277,203.00 Per Debtor(s) Schedule A

5. Default

a. XX Pre-Petition Default

Number of months 0+ Amount \$ 0.00

b. XX Post-Petition Default

i. XX On direct payments to the moving creditor

Number of months 5+ Amount \$ 2,769.00

ii. On payments to the Standing Chapter 13 Trustee

Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

6. Other Allegations

a. Lack of Adequate Protection § 362(d)(1)

i. No insurance

ii. Taxes unpaid Amount \$ \_\_\_\_\_

iii. Rapidly depreciating asset

iv. XX Other (describe) Failure to pay association assessments, fees, and costs

b. No Equity and not Necessary for an Effective Reorganization § 362(d)(2)

c. Other “Cause” § 362(d)(1)

i. Bad Faith \_\_\_\_\_

ii. Multiple filings \_\_\_\_\_

iii. Other (describe) \_\_\_\_\_

d. Debtor’s Statement of Intention regarding the collateral

i. Reaffirm ii. Redeem iii. Surrender iv. No Statement of Intention Filed

Date: May 1, 2020

/s/ Ronald J. Kapustka

Counsel for Movant

(Rev. 12/21/09)

NOTE: Pursuant to the Fair Debt Collection Practices Act you are advised that this law firm is deemed to be a debt collector attempting to collect a debt and any information obtained will be used for that purpose.

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